

# DNR/PEI FILE EXCHANGE NOTES

June 29, 2005

Attendees:

Vern Schrunk—DNR

Ken McFadden--PEI

- **POLICY/GUIDANCE AND/OR JUDGMENT ISSUES:**

**8LTS44, City of Davenport Maintenance Facility, Davenport**, SMR reclassification (L2N) 5 SMRs, 2002 reclassification report, recommend accept contingent upon an apparent “phone call” resolvable deficiency. Refer to Notes to DNR –1 listed below and subsequent **PM** section (Rev-SS, QA-KM).

As presented in the draft RP letter:

**Notes to DNR:**

1. It appears the only deficiency preventing this site’s “no action required” classification (highlighted bullet below) could be resolved with a telephone call.
2. It is unclear why TEH-D is listed among the analytical parameters in the September 28, 1999 monitoring certificate. Based on the revised (August 1999) Tier 2 Report, no pathways were at risk for TEH-D. Therefore, the related TEH-D analysis deficiencies are listed in the attached memo (deficiency 2 [p. 1] and deficiency 1 [p. 2] regarding the 2002 SMR).

The department has determined the data either do not exceed the applicable Tier 1 or Tier 2 levels, or the pathways by which a chemical of concern may reach an actual or potential receptor are incomplete. Therefore, the department is assigning the site a “**No Action Required**” classification. No additional action is required at this time. We will update our records to show the change in status.

The department has identified some technical problems in the Tier 2 Report. These problems do **NOT** require correction in this report, but are identified in the attached memo for the attention and benefit of your consultant.

A **no further action certificate** for this site may be obtained by submitting to the department the following:

- **A chain of custody form for the 2004 groundwater samples was not provided.**
- An accurate and complete legal description of the site, as found in the deed or mortgage.  
NOTE: A legal description obtained from a tax form is **not** acceptable.

Refer to file deliverables and draft RP letter for additional text. Files returned today.

**7LTP48, Kum & Go #9 (former Short Stop) Sigourney, RT2 (3<sup>rd</sup>)**, 3/11/05 DNR letter in ‘Teleconference’ format and established 7/7/05 as the teleconference date. 3<sup>rd</sup> RT2 addresses defs/issues in the 3/11/05 DNR letter. Review while not listed or requested as expedite, was reviewed to accommodate the 7/7/05 teleconference. Draft RP letter provided in deliverables was modified from the ‘teleconference’ letter format, reaffirmed the scheduled 7/7/05 teleconference established in the DNR’d 3/11/05 RP letter. Deficiencies included. (Rev-TG, QA-KM).

As presented in the draft RP letter:

The DNR welcomes the opportunity to discuss the site classification and how site reclassification of your site may be obtained. In an effort to facilitate corrective action activities, the DNR in our 3/11/05 letter scheduled a teleconference for **July 7, 2005**. The previously established time table remains in effect. If you are unable to participate in the teleconference please inform the DNR as soon as possible.

**FOR DNR REVIEW:** The department has identified some technical problems in the revised Tier 2 SCR.

***These problems require correction/clarification prior to implementation of corrective action at the site.*** Be aware the comments and problems noted below may affect pathways, receptors, risk classification, site-specific target levels (SSTLs), the proposed monitoring plan and the proposed corrective action. Your certified groundwater professional should be prepared to discuss how these deficiencies will be addressed during the teleconference:

Concerning items #2 and #3 of our 3/11/05 letter, the response in the cover letter with the Tier 2 revisions is not accepted.....

Refer to file deliverables and draft RP letter for additional text. Files returned today.

- **PROJECT MANAGEMENT**

Resulting from Kiazen BIP: 6/1 JH requested Preston inform the DNR through a “Note to DNR” on the draft RP letter, when in Preston’s opinion a deficiency may be resolvable with a phone call (to CGP/ RP/ other) and result in NAR. A “Note(s)” will not be provided (pertaining to an apparent phone call resolvable def) when/if other def’s exist (e.g. requiring field work) are apparent.

6/14/05 DNR email response provided and acknowledged.

**8LTS44, City of Davenport Maintenance, Davenport , aforementioned agenda item presented as an example of apparent ‘phone call’ resolvable def.**